

MILMAN LABUDA LAW GROUP PLLC

3000 MARCUS AVENUE
SUITE 3W8
LAKE SUCCESS, NY 11042

TELEPHONE (516) 328-8899
FACSIMILE (516) 328-0082

August 9, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Pamela K. Chen, U.S.D.J.
225 Cadman Plaza East
Courtroom 4F North
Brooklyn, NY 11201-1804

Re: IME WatchDog, Inc. v. Gelardi, et al.
Case No.: 1:22-cv-1032 (PKC) (JRC)
MLLG File No.: 25-2022

Dear Judge Chen:

This office, along with Sage Legal LLC, represents the Plaintiff IME WatchDog, Inc. ("Plaintiff") in the above-referenced case.

Plaintiff writes in accordance with this Court's Order dated July 30, 2024 directing it to indicate whether Jeremy Koenig ("Mr. Koenig") of Giant Partners, Inc. ("GP") will testify and, if so, the proposed dates for such testimony.

Plaintiff has secured the cooperation of GP to appear for a virtual hearing on September 18, 25, or 27¹ at any time at or after noon Eastern Standard Time because the witness is in California. However, Plaintiff respectfully submits that, while Mr. Koenig will be available should the Court wish to ask him any questions, Corey Weissman of GP is the more appropriate witness to testify concerning the issues relevant to the contempt hearing. As such, both Messrs. Koenig and Weissman shall appear on the date selected by the Court.

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Jamie S. Felsen, Esq.

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.

cc: All Counsel of Record (via ECF).

¹ Defendants, their counsel, non-party Eugene Liddie, and his counsel have confirmed their availability on these dates.